

LOW 83-3.070

March 28, 1983

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

Mr. David Edwards
Facilities Manager
Litton Industries, Inc.
4811 W. Kearney, P.O. Box 2847
Springfield, Missouri 65803

Dear Mr. Edwards:

Enclosed please find a copy of the Resource Conservation and Recovery Act Compliance Inspection Report for your facility. I believe it is self-explanatory.

Litton Systems, Inc. should follow the two recommendations in the attached inspection report. By April 22, 1983, please confirm in writing to Ms. Sandra Carroll of this office and to the Springfield Regional Office that the Unsatisfactory Features have been rectified.

If you have any questions or if we can be of assistance to you, please don't hesitate to contact Ms. Carroll or the Springfield Regional Office.

Sincerely,

David E. Bedan, Ph.D.
Director
Waste Management Program

DEB:SC:dr

Enclosures

cc: Springfield Regional Office
Mr. David Doyle, U.S. EPA Region VII



R00337355
RCRA RECORDS CENTER

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7/25/83

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

LITTON INDUSTRIES INC., ADVANCED CIRCUITRY DIVISION

4811 W. Kearney, P. O. Box 2847

Springfield, Missouri 65803

(417) 862-0751

EPA ID# MOD007152903

MDNR# 01317

Contact: David Edwards, Facilities Manager

On March 10, 1983, Burt McCullough, Missouri Department of Natural Resources, Springfield Regional Office conducted a hazardous waste compliance inspection at Litton Industries at Springfield in Greene County, Missouri. Litton manufactures printed circuit boards. In the process, the boards are electroplated and etched. The wastewater from this process (approximately 112,000 gallons per day) is treated prior to discharge to Springfield sewers. Previously, Litton had operated a surface impoundment for the disposal of wastewater until around September 1982, at which time the impoundment was closed in accordance with U.S. Environmental Protection Agency and the Missouri Department of Natural Resources' approval. Now that the impoundment is closed, Litton's status is that of a generator rather than that of a treatment/storage/disposal facility. Hazardous wastes generated at Litton include wastewater treatment sludge (F006) at a rate of 102.37 Kkg/yr.; spent chromic acid (D007) at a rate of 2.839 Kkg/yr.; and waste oil at a rate of 93.84 Kkg/yr. The wastewater treatment sludge is transported by Chemical Waste Management, Inc. and landfilled at Chemical Waste Management, Inc.'s facility at Elwood, Illinois. The spent chromic acid is transported by National Industrial Environmental Services of Wichita, Kansas to Chemical Waste Management's facility at Emille, Alabama for treatment. The waste oil is transported by Southwest Oil Company of Springfield, Missouri to Radium Oil Company at Kansas City, Missouri, for resource recovery. At the date of inspection, Litton had made 141 shipments of hazardous waste since January 1, 1982. This number of shipments is larger than normal primarily because of the number of hazardous waste shipments made during closure of their surface impoundment.

UNSATISFACTORY FEATURES:

- 1) Not all manifests were dated on the appropriate portion of the manifest document as required by 40 CFR 262.23 and 10 CSR 25-5.010 (4).
- 2) The date of accumulation was not marked on a container of wastewater treatment sludge as required by 40 CFR 264.34 and 10 CSR 25-7.050.

COMMENTS:

Most of the 141 manifest documents generated since January 1, 1982 were completed properly; however, from a period of about August 1982 to October 1982, dates of shipping or receiving were not included in the appropriate column of Missouri manifest documents. These documents were dated when they were signed, but should have also been dated in the appropriate column.

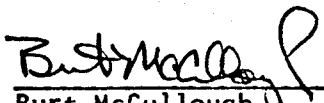
All containers of spent chromic acid (55-gallon drums) were marked in accordance with 40 CFR 262.34 and 10 CSR 25-7.050. These drums were being stored prior to shipment on a concrete diked confinement structure that meets the requirements of 10 CSR 25-7.050 (3)(F). Prior to shipment, wastewater treatment sludge is stored in a roll-off container with a volume of approximately 20 cubic yards. This sludge is a solid which is placed in the container after dewatering in a filter press. This container did not have the date of accumulation marked on it. It did; however, have a decal which had the legend "Hazardous Waste - Federal Law Prohibits Improper Disposal," as required by 40 CFR 262.32 and 10 CSR 25-5.010 (6)(D). All containers of hazardous waste were in good condition.

Litton personnel involved in hazardous waste management have successfully completed classroom training in hazardous waste handling. All documentation with respect to training, job titles, and position descriptions was in order. Litton has developed a detailed contingency plan with procedures to be followed in a hazardous waste emergency. Copies of the contingency plan have been distributed to local emergency agencies. Litton has all the applicable internal communication systems, and the ability to summon emergency assistance. Security is provided by a 24-hour, 365 day/yr. guard service.

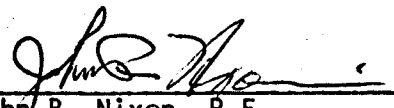
RECOMMENDATIONS:

- 1) Litton should insure that all manifest documents are completed properly, in the future.
- 2) Litton should begin marking the date of accumulation on all containers of hazardous waste.

Submitted by:


Burt McCullough
Environmental Specialist

Approved by:


John R. Nixon, P.E.
Regional Administrator

HAZARDOUS WASTE GENERATOR CHECKLIST

of Facility: Litton Systems Inc., Advanced Circuitry Div.
 Address: 4801 W. Kearney P.O. Box 2847
Springfield MO 65803

Date: 3-10-83Facility Representative: David EdwardsMissouri I.D. # 01317Title: Facility Mgr.EPA I.D. # MO0007152903Phone Number (417) 862-0751Is this facility a TSD? NOTransporter? NO

Provide a brief description of the manufacturing process.

MANUFACTURE of printed circuit boards

List the hazardous wastes produced:

Waste	Amount/month	Kilogram/month	I.D. #	Disposition
1. <u>Wastewater treatment sludge from electroplating</u>	<u>19767.42#</u>	<u>8530.6</u> 4488.33	<u>F006</u>	<u>Landfill/Elwood, IL</u>
2. <u>Spent Chromic Acid</u>	<u>520.45#</u>	<u>236.6</u> 1115	<u>D007</u>	<u>Treatment/Emille, AL</u>
3. <u>Waste Oil</u>	<u>17204.54#</u>	<u>7820.2</u> 3850		<u>RR/KC, MO</u>
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____
6. _____	<u>199,048.8 Kg/yr</u>	_____	_____	_____
Total	<u>96350 kg/yr</u>	<u>16,587 Kg/mo</u>		

Subtract amount going to Resource Recovery or sewer

Amount subject to generator fee 105,206.4 Kg 93,842.4 Kg/yr (subject if over 2000 lbs. of waste is produced)Is generator fee applicable to this facility? Yes X No _____If so, is the fee being paid? Yes X No _____If the total amount of hazardous waste produced is less than 1000 kg/month, is over 1000 kg ever accumulated? Yes X No _____Inspector's Name: Burt McCulloughTitle: Environmental SpecialistOffice: SRO (417) 883-4033

A. MANIFESTS 10 CSR 25-5.010(4)

1. Generator's Missouri and EPA I.D. Number ☒
2. Serially increasing shipment number ☒
3. Generator's name, address, phone number, EPA I.D. number. ☒
4. All transporters' names, addresses, phone numbers, and EPA I.D. numbers ☒
5. Hazardous waste management facility name, address, phone number, and EPA I.D. number ☒
6. Proper DOT shipping name and hazard class ☒
7. Quantity, container type, and number of units being shipped ☒
8. Emergency instructions and special handling procedures... ☒
9. Proper certification ☒
10. Manifest properly signed and dated ☒

11. Time between generator and facility signature less than 7 days ☒
12. Manifests returned within 30 days ☒
13. If not, exception generator report submitted within 45 days ☒
14. Completed manifests submitted to Department quarterly ☒

Comments on manifests

#11 - most were OK, however some manifests from August through October, 1982 did not have dates in appropriate column
see written report

B. CONTAINERIZATION AND LABELING 10 CSR 25-5.010(6)

15. Waste properly containerized and labeled before being transported off-site ☒
16. Containers marked "Hazardous Waste" ☒

C. STORAGE STANDARDS 10 CSM 25-7.050

- For storage of less than 1000 kg proceed to Section G.
For storage of over 1000 kg complete Sections D, E, & F.

- D. PERSONNEL TRAINING 10 CSR 25-7.050 cross-referenced to
10 CSR 25-7.011(J)(F)

- E. PREPAREDNESS AND PREVENTION 10 CSR 25-7.050(2)(A) cross-referenced to 10 CSR 25-7.011(4)

- F. CONTINGENCY PLAN AND EMERGENCY PROCEDURES** 10 CSR 25-7.050(2)(A)
cross-referenced to
10 CSR 25-7.011(5)

- Comment:**

- 6. CONTAINER STORAGE 10 CSR 25-7.050(3)**

37. Containers in good condition ☒
38. Containers storing incompatible wastes or products are separated or protected from each other ☒
39. Containers kept closed in storage ☒
40. Containers stored within a waste confinement structure (if applicable) that meets the criteria of 10 CSR 25-7.050(3)(F) ☒
41. Containers of ignitable or reactive waste are stored at least 50 feet from the property line ☒

Comment:

- N. STORAGE TANKS 10 CSR 25-7.050(4)**

42. Tanks in good condition.....
43. Procedure for inspecting tanks.....
44. Above ground tanks - adequate spill confinement structures.....
45. Underground tanks that cannot be entered have adequate leak detection systems.....
46. Leak detection procedure and schedule developed and used.....
47. Open tanks have _____ ft. freeboard.....
48. Incompatible wastes in tanks safely and properly stored.....
49. Volatiles not placed in open tanks.....
50. Ignitable or reactive wastes in tanks safely and properly stored.....
51. Ignitable or reactive wastes in covered tanks stored in accordance with NFPA's buffer zone requirements.....
52. Controls to prevent overfilling.....
53. Daily inspection of overfilling control equipment.....
54. Daily inspection of freeboard in uncovered tanks.....

HAZARDOUS WASTE STORAGE TANKS

Waste Contained

Volume of Tank

Comment: See written report

3/10/83

Inspector's Signature